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9 Attorneys for WAYMO LLC

10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

12 WAYMO LLC,

13 Plaintiff,

14 vs.

15 UBER TECHNOLOGIES, INC.;  
16 OTTOMOTTO LLC; OTTO TRUCKING  
17 LLC,

18 Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF ANDREA PALLIOS  
ROBERTS IN SUPPORT OF PLAINTIFF  
WAYMO LLC'S OPPOSITION TO  
DEFENDANTS' MOTION TO STRIKE  
TRADE SECRET CLAIMS**

1 I, Andrea Pallios Roberts, hereby declare as follows.

2 1. I am a member of the bar of the State of California and a partner with Quinn Emanuel  
3 Urquhart & Sullivan, LLP, counsel for Plaintiff Waymo LLC (“Waymo”). I make this declaration of  
4 personal, firsthand knowledge, and if called and sworn as a witness, I could and would testify  
5 competently as follows.

6 2. On August 7, 2017, I attended a meet and confer conference call with counsel for  
7 Defendants and Special Master John Cooper. During the meet and confer, the parties discussed Mr.  
8 Kim’s email correspondence from Friday evening, August 4, 2017, in which Uber asserted for the first  
9 time that certain trade secrets identified by Waymo were either vague or overbroad. I asked whether  
10 there was anything that Waymo could do to address Uber’s concerns with the challenged trade  
11 secrets. Uber’s counsel refused to engage and would not identify anything that Waymo could do to  
12 try to cure the purported deficiencies in its disclosure. Similarly, I asked if Uber would consider  
13 allowing Waymo to swap in other trade secrets to the nine it will take to trial since Uber had laid in  
14 wait and did not identify any deficiencies in Waymo’s identified trade secrets until after Waymo  
15 narrowed its list—despite having had Waymo’s list for 5 months. Uber refused that proposal as well.

16 3. Attached as Exhibit 1 is a true and correct copy of an excerpt from the August 8, 2017  
17 deposition transcript of Dmitri Dolgov.

18 4. Attached as Exhibit 2 is a true and correct copy of an excerpt from Defendant Uber  
19 Technologies, Inc. and Ottomotto LLC’s July 31, 2017 Responses to Waymo’s Second Set of  
20 Common Interrogatories (Nos. 4-7).

21 5. Attached as Exhibit 3 is a true and correct copy of an excerpt from Defendant Uber  
22 Technologies, Inc. and Ottomotto LLC’s July 28, 2017 Responses to Waymo’s First Set of Common  
23 Interrogatories (Nos. 1-3).

24 6. Attached as Exhibit 4 is a true and correct copy of an excerpt from the August 4, 2017  
25 deposition transcript of Daniel Gruver.

26 7. Attached as Exhibit 5 is a true and correct copy of a March 19, 2016 email exchange  
27 bearing the bates label UBER00018068-70.

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9. Attached as Exhibit 7 is a true and correct copy of a January 20, 2016 email exchange bearing bates label UBER00060147-56 and marked as Deposition Exhibit 397.

11. Attached as Exhibit 9 is a true and correct copy of an excerpt from the August 9, 2017 deposition transcript of James Haslim.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

/s Andrea Pallios Roberts  
Andrea Pallios Roberts

Pursuant to Local Rule 5-1(i)(3), I attest under penalty of perjury that concurrence in the filing of this document has been obtained from Jordan R. Jaffe.

*/s/ Charles K. Verhoeven*  
Charles K. Verhoeven